

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

STATE OF CALIFORNIA;
COMMONWEALTH OF
MASSACHUSETTS; STATE OF NEW
JERSEY; STATE OF COLORADO; STATE
OF ILLINOIS; STATE OF MARYLAND;
STATE OF NEW YORK; and STATE OF
WISCONSIN,

Plaintiffs,

v.

U.S. DEPARTMENT OF EDUCATION;
DENISE CARTER, in her official capacity
as former Acting Secretary of Education and
current acting Chief Operating Officer,
Federal Student Aid; LINDA MCMAHON,
in her official capacity as Secretary of
Education,

Defendants.

Case No. 1:25-cv-10548

**DECLARATION OF ADELAIDE PAGANO IN FURTHER SUPPORT OF PLAINTIFF
STATES' MOTION FOR PRELIMINARY INJUNCTION**

Adelaide Pagano, an attorney admitted to practice before this Court and admitted to practice before the Courts of Massachusetts, does hereby state the following under penalty of perjury, pursuant to 28 U.S.C. § 1746:

1. I am Adelaide Pagano, Assistant Attorney General in the Office of the Attorney General for the State of Massachusetts, and I appear on behalf of the Commonwealth of Massachusetts in this action.

2. I submit this declaration in further support of Plaintiff States' Motion for Preliminary Injunction. The facts set forth herein are based upon my personal knowledge and/or a review of the files in my possession.

3. Attached hereto as Exhibit 22 is the cooperative agreement between the Department of State and the United States Conference of Catholic Bishops, filed in *U.S. Conference of Catholic Bishops v. U.S. Dep't of State*, No. 1:25-CV-00465, Doc. No. 5-4 (D.D.C.).

4. Attached hereto as Exhibit 23 is the Declaration of Heather Kirkpatrick, Ph.D., President and Chief Executive Officer at Alder Graduate School of Education, filed in *American Association of Colleges for Teacher Education v. Carter*, No. 25-cv-00702, Doc. No. 5-8 (D. Md.).

5. Attached hereto as Exhibit 24 is correspondence, dated March 13, 2025, filed by counsel for plaintiffs in *American Association of Colleges for Teacher Education v. Carter*, No. 25-cv-00702, Doc. No. 29 (D. Md.).

6. Attached hereto as Exhibit 25 is the grant abstract for the TQP grant received by Coppin State University, which is publicly available on the Department of Education website, <https://tinyurl.com/2n6nfu8v> (last visited Mar. 20, 2025).

Dated: Boston, Massachusetts
March 21, 2025

s/ Adelaide Pagano
Adelaide Pagano (BBO# 690518)
Assistant Attorney General
Office of the Attorney General
Commonwealth of Massachusetts

CERTIFICATE OF SERVICE

Counsel for Plaintiff States certify that they have submitted the foregoing document with the clerk of court of the District of Massachusetts, using the electronic case filing system of the Court. Counsel for Plaintiff States hereby certify that they have served all parties electronically or by another manner authorized by Fed. R. Civ. P. 5(b)(2).

/s/ Adelaide Pagano
Adelaide Pagano (BBO #690518)
Assistant Attorney General

Dated: March 21, 2025